

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA**

I.B.I.D. ASSOCIATES LIMITED  
PARTNERSHIP d/b/a I.B.I.D. ASSOCIATES,  
L.P.,

Plaintiff,

V.

Case No. 2:22-cv-00954-JDW

COUNCILMEMBER JAMIE GAUTHIER and  
THE CITY OF PHILADELPHIA,

Defendants.

**PLAINTIFF IBID’S MOTION TO COMPEL PRODUCTION OF DOCUMENTS IN  
RESPONSE TO ITS REVISED FIRST SET OF  
REQUESTS FOR PRODUCTION OF DOCUMENTS**

Plaintiff, I.B.I.D. Associates Limited Partnership d/b/a I.B.I.D. Associates, L.P. (“IBID”), respectfully moves this Court to compel Defendants, Councilmember Jamie Gauthier and the City of Philadelphia, to produce documents in response to its Revised First Set of Requests for Production of Documents. The bases for this motion are set forth in detail in the accompanying Memorandum of Law, which is incorporated herein by reference.

Pursuant to Local Rule 26.1(f) and Section C.1 of the Honorable Joshua D. Wolson's Policies and Procedures, I hereby certify that the Parties have met and conferred on the issues raised in this Motion to Compel, but despite making a good faith effort, were unable to resolve the issues informally. Specifically, the Parties met and conferred via telephone conference on April 11, 2022, to discuss Defendants' objections to IBID's First Set of Requests for Production of Documents. Following the meeting, in a good faith effort to address Defendants' objections and offer a reasonable compromise, IBID served revised discovery requests significantly narrowing

the scope of requested documents and specifically excluding information most directly encompassed by Defendants' objections.

Despite these efforts, except for agreeing to produce a very limited set of documents (most of which already are publically available), Defendants raised the same objections in response to the revised discovery requests as they did in response to the original requests. Given the expedited discovery schedule in this matter and the April 29, 2022 deadline to produce documents, as well as Defendants' refusal to compromise, Plaintiff had no choice but to raise the instant dispute with the Court.

WHEREFORE, IBID respectfully requests that this Court enter the attached proposed order granting IBID's Motion to Compel for the reasons set forth in the accompanying Memorandum of Law.

**BALLARD SPAHR LLP**

Dated: April 22, 2022

By: /s/ Michael R. McDonald  
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